

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

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In re	: Chapter 9
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CITY OF DETROIT, MICHIGAN,	: Case No. 13-53846
	:
Debtor.	: Hon. Steven W. Rhodes
	:
-----X	:

**STIPULATION FOR AN ORDER AUTHORIZING THE  
CITY AND THE RETIREE COMMITTEE TO FILE UNDER  
SEAL SETTLEMENT AGREEMENT RESOLVING CORRECTED  
MOTION OF THE OFFICIAL COMMITTEE OF RETIREES FOR ENTRY  
OF AN ORDER ALLOWING AN ADMINISTRATIVE EXPENSE CLAIM**

The City of Detroit, Michigan (the "City") and the Official Committee of Retirees of the City of Detroit, Michigan (the "Retiree Committee" and, together with the City, the "Parties"), by and through each of their undersigned counsel, stipulate as follows:

1. On February 7, 2014, the Retiree Committee filed the Corrected Motion of the Official Committee of Retirees for Entry of an Order Allowing an Administrative Expense Claim (Docket No. 2660) (the "Administrative Expense Request"). The Administrative Expense Request amended and superseded the Motion of the Official Committee of Retirees for Entry of an Order Allowing an

Administrative Expense Claim (Docket No. 2656), filed by the Retiree Committee on February 6, 2014.

2. On February 20, 2014, the City filed the Debtor's Objection to Corrected Motion of Official Committee of Retirees for Entry of an Order Allowing an Administrative Expense Claim and an accompanying brief in opposition (Docket Nos. 2705 and 2706) (together, the "Objection").

3. On February 28, 2014, the Retiree Committee filed the Reply in Support of Motion of the Official Committee of Retirees for an Order Allowing an Administrative Expense Claim and in Response to City's Opposition Thereto (Docket No. 2782) (the "Reply").

4. The Court conducted an initial hearing with respect to the relief requested in the Administrative Expense Request on March 5, 2014, at 10:00 a.m., Eastern Time (the "Hearing").

5. Following the Hearing, the Parties have resolved the Administrative Expense Request, the Objection and the Reply pursuant to the terms of a Settlement Agreement (the "Settlement Agreement").

6. As part of the resolution of the Administrative Expense Request, the Objection and the Reply, the Parties agreed to request that the Court permit the filing under seal of the Settlement Agreement in order to further protect

the members of the Retiree Committee and the City from frivolous, vexatious or harassing litigation.

7. Accordingly, the Parties have agreed to, and request that the Court enter, the order attached hereto as Exhibit 1.

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Dated: March 25, 2014

/s/ Sam J. Alberts

Matthew E. Wilkins (P56697)  
Paula A. Hall (P61101)  
BROOKS WILKINS SHARKEY &  
TURCO PLLC  
401 South Old Woodward, Suite 400  
Birmingham, Michigan 48009  
Tel: (248) 971-1800  
wilkins@bwst-law.com  
hall@bwst-law.com

Sam J. Alberts  
DENTONS US LLP  
1301 K Street, NW  
Suite 600, East Tower  
Washington, DC 20005-3364  
Tel: (202) 408-6400  
sam.alberts@dentons.com

Carole Neville  
Claude D. Montgomery  
DENTONS US LLP  
1221 Avenue of the Americas  
New York, New York 10020  
Tel: (212) 768-6700  
carole.neville@dentons.com  
claudemontgomery@dentons.com

ATTORNEYS FOR THE  
RETIREE COMMITTEE

/s/ Heather Lennox

David G. Heiman (OH 0038271)  
Heather Lennox (OH 0059649)  
JONES DAY  
North Point  
901 Lakeside Avenue  
Cleveland, Ohio 44114  
Telephone: (216) 586-3939  
Facsimile: (216) 579-0212  
dgheiman@jonesday.com  
hlennox@jonesday.com

Bruce Bennett (CA 105430)  
JONES DAY  
555 South Flower Street  
Fiftieth Floor  
Los Angeles, California 90071  
Telephone: (213) 243-2382  
Facsimile: (213) 243-2539  
bbennett@jonesday.com

Jonathan S. Green (MI P33140)  
Stephen S. LaPlante (MI P48063)  
MILLER, CANFIELD, PADDOCK  
AND STONE, P.L.C.  
150 West Jefferson  
Suite 2500  
Detroit, Michigan 48226  
Telephone: (313) 963-6420  
Facsimile: (313) 496-7500  
green@millerandcanfield.com  
laplante@millerandcanfield.com

ATTORNEYS FOR THE CITY

**EXHIBIT 1**

**UNITED STATES BANKRUPTCY COURT  
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**ORDER AUTHORIZING THE CITY AND THE  
RETIREE COMMITTEE TO FILE UNDER SEAL  
SETTLEMENT AGREEMENT RESOLVING CORRECTED  
MOTION OF THE OFFICIAL COMMITTEE OF RETIREES FOR ENTRY  
OF AN ORDER ALLOWING AN ADMINISTRATIVE EXPENSE CLAIM**

This matter coming before the Court on the Stipulation for an Order Authorizing the City and the Retiree Committee to File Under Seal Settlement Agreement Resolving Corrected Motion of the Official Committee of Retirees (the "Stipulation"),<sup>1</sup> filed jointly by the City of Detroit, Michigan (the "City") and the Official Committee of Retirees of the City of Detroit, Michigan (the "Retiree Committee") and, together with the City, the "Parties"; the Court being advised that the Parties have agreed to request that the Court permit the filing under seal of the Settlement Agreement as part of the resolution of the Administrative Expense

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<sup>1</sup> Capitalized terms not otherwise defined herein have the meanings given to them in the Stipulation.

Request, the Objection and the Reply; the Court having reviewed the Stipulation; the Court finding that (a) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, (b) this is a core proceeding pursuant to 28 U.S.C. § 157(b) and (c) cause exists justifying the filing under seal of the Settlement Agreement; and the Court being fully advised in the premises;

IT IS HEREBY ORDERED THAT:

1. The Stipulation is APPROVED.
2. Pursuant to section 107 of title 11 of the United States Code, the Parties are authorized to file and maintain the Settlement Agreement under seal.

### **CERTIFICATE OF SERVICE**

I, Heather Lennox, hereby certify that the foregoing Stipulation for an Order Authorizing the City and the Retiree Committee to File Under Seal Settlement Agreement Resolving Corrected Motion of the Official Committee of Retirees was filed and served via the Court's electronic case filing and noticing system on this 25th day of March, 2014.

/s/ Heather Lennox